

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MURs 4693, 4737, 4868  
 )  
 Washington State Republican )  
 Party, Federal Account, and )  
 Al Symington, Treasurer )

JUN 15 8 18 AM '99

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL COUNSEL

## BRIEF OF COMMITTEE

## I. Statement of the Case

In 1996 and 1997, the Washington State Republican Party ("WSRP") was a semiannual filer with the Federal Election Commission. The WSRP's semiannual filing was adequate for the historical amount and number of contributions and expenditures to be reported.

During the period August to November 1996, the WSRP experienced an unprecedented increase in contributions. From August 28, 1996 to November 25, 1996, the WSRP received contributions totaling \$2,404,276.42. During this 90 day window, the WSRP handled contributions nearly as great as had been received in any previous year. The WSRP's longstanding accounting system, which had served the party well for nearly 20 years was unable to keep up with the much greater level of activity. As a result, the party incorrectly calculated the amount of the permitted transfers under 11 CFR 106.5(g). The WSRP over-transferred \$285,316.22 from a nonfederal account to the federal account to cover "allocable" expenses. During the same period, the WSRP paid \$80,203.89 in nonfederal expenses from the federal account, and reimbursed the federal account.

During the second half of 1997, in large part as a result of a picnic for the party rank and

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file that was completely underwritten by a corporate donor, the WSRP had excess transfers from its nonfederal account of \$248,000.

As a result of these accounting errors, the Federal Election Commission, on December 4, 1998, found reason to believe that the WSRP and its treasurer, Al Symington violated 2 USC §441f(a), §441b(a) and 11 CFR §102.5(a)(1)(i) and §106.5(g)(1)(i).

## II Factual and Legal Analysis

### A. The 1996 overtransfer was the result of accounting errors, not a knowing acceptance of ineligible reimbursements for allocable expenses.

In November 1992, the citizens of Washington passed Initiative 134 (I-134"), a campaign finance reform initiative that limited the amounts that could be contributed to candidates, and strengthened the role of political parties, by permitting unlimited contributions and expenditures for internal organization, GOTV and similar activities, referred to as "exempt" activities. The 1996 Presidential election was the first under the new state campaign finance regime.

The WSRP bookkeeper, Joan Bedlington, was experienced. She had served as party bookkeeper for 18 years at the time of the 1996 election. The party also used the services of an outside, part-time comptroller, to assist in preparing financial statements, and campaign finance reports. The accounting system that had been developed over those years worked well, and was able to handle the historical volume of contributions and reporting. The system was a combination of manual and computerized systems, with heavier emphasis on manual accounting controls.

Total WSRP revenues during 1996 election year were \$7,444,061. This is more than 400% of the revenues from the 1992 Presidential election year and 383% of the total revenues to

the WSRP from the 1988 election. The contributions to the WSRP in the 90 days from the end of August to the end of November alone were \$2,404,276.42. This amount, itself, was 150% of the total revenue from the prior Presidential election year. The contributions received during this 90 day period exceeded all prior years' contributions, except for 1994, when the total annual revenue was \$2,689,077. See Exhibit A attached.

The 1996 level of activity was both unprecedented and unexpected. The corresponding jump in contributions in 1994, the first general election under I-134 was about 80% higher than the preceding nonpresidential general election in 1990. There were no indications that the 1996 contributions would increase by more almost \$5 million over the 1994 levels.

In mid-October 1996, the WSRP transferred \$425,000 from its state "exempt" account to the federal account as a reimbursement for the state account's share of allocable expenses. At the time the transfer was made, the WSRP believed its transfer capacity for allocable expense reimbursement was not less than the \$425,000 transferred. During 1996, the WSRP made 78 transfers from its state account to the federal account for reimbursement of allocable expenses. Approximately \$4,391,987 was transferred during 1996.

While the WSRP's accounting system had been adequate to handle annual volume of up to about \$2.7 million, it failed to keep accurate track of the volume in the last weeks before the 1996 election.

- B. Had the WSRP known of the federal funds imbalance, it could have borrowed from its regular bank, as it had in 1994 when federal funds ran short.

In October 1994, the Washington State Republican Party borrowed approximately

\$100,000 from the Bank, to avoid a deficit in its federal account. The party chairman in 1994 was also the party chairman in 1996. The party's treasurer in 1996 was the same as 1994. The party's bookkeeper was also the same in 1996, as they had been in 1994. The WSRP had its regular banking relationship with the same bank in 1996 as it did in 1994.

The significant differences in 1996 from 1994 were that the WSRP had much greater revenue, and that it did not know that its federal account had come out of balance as a result of transfers for allocable expenses." As the declaration of Ronald Bosi, previously submitted indicates, the National Bank of Tukwila would have loaned the WSRP the necessary funds to avoid an excess transfer of funds to the federal account. If anything, the WSRP had become a much better credit risk in 1996, because the party's revenues had increased nearly three times from the date of the prior borrowing.

The final important distinction between 1994 and 1997, when the excess transfer was discovered, was that the WSRP's institutional memory was gone. The bookkeeper of 18 years and the chairman who had served since 1993 were gone. Neither the newly elected chairman, or the newly hired bookkeeper knew of the 1994 borrowing, or that a borrowing was possible to correct the funds imbalance.

Had the chairman, treasurer, or bookkeeper realized that the allocable expenses had come out of balance, or that there was a substantial likelihood that they would, a loan could easily have been concluded in October 1996, just as it had in October 1994.

The FECA prohibits corporations, labor unions, national banks and certain other categories of persons from making contributions "in connection" with federal elections. It is also a violation for a political party "knowingly to accept or receive" a prohibited contribution. 2

U.S.C. §441b(a). Notwithstanding this prohibition, the FECA elsewhere directs political parties to allocate certain expenses, between their federal receipts and nonfederal receipts. 11 CFR §106.5. Reimbursements from a political party's nonfederal account, which may contain otherwise ineligible contributions are expressly permitted, up to the "nonfederal" share of those expenses. The FECA does permit transfers. Standing alone, a transfer of funds from a nonfederal account of a political party to its federal account is not a knowing acceptance of illegal funds or a violation of the prohibition in §441b(a) against corporate or labor union contributions.

It is a black letter canon of statutory construction that words, unless a specific meaning is otherwise ascribed, are to be given their common meaning. The term "knowing" is defined as

With knowledge; consciously; intelligently; willfully; intentionally. An individual acts "knowingly" when he acts with awareness of the nature of his conduct. *State v. Kroll*, Mo. App 682 S.W.2d 78, 81. Act is done "knowingly" or "purposely" if it is willed, is product of conscious design, intent or plan that it be done, and is done with awareness of probable consequences. *Horne v. State, Ind.*, 445 N.E.2d 976, 978. (Emphasis added).

Black's Law Dictionary, 872, 6<sup>th</sup> Ed. (1990). In October 1996, when the WSRP made its transfer that resulted in an excess reimbursement, it did not "knowingly" accept any ineligible funds into its federal account. It did so "unknowingly," and as a result of the unforeseeable breakdown in its longstanding accounting system. MUR 4709 and MUR 4751 do not address the the issue whether an erroneous transfer, made in the belief that there were adequate federal funds, is a knowing acceptance of ineligible contributions under §441b.<sup>1</sup>

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<sup>1</sup>During the period in question, October 18, 1996 through November 25, 1996, the WSRP made no contributions to federal candidates. None of the "excess" transfer was spent in connection with a federal election.

- C. The WSRP took prompt steps in 1997 to make repayment of the excess reimbursements to the federal account.

During the first half of 1997, after the WSRP learned of the excess reimbursements to the federal account, the party made substantial effort to correct the error. The March 20, 1997 letter from RAD states, after recommending that the excess be repaid to the federal account, "Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration." Exhibit F. The party's June 30 report, the next due after the excess reimbursement was discovered, showed \$126,000 in payments to eliminate the federal account deficit.

The repayment of \$126,000 represented a very substantial portion of the federal receipts to the committee during 1997. Total federally eligible contributions in 1997 were \$278,133. The repayment represented over 45% of federal receipts.

In 1997, the WSRP formula for dividing "allocable" expenses under 11 CFR 106.5 changed from 78% "state" and 22% federal to 66 2/3% "state" and 33 1/3% federal, because of the change in ballot composition for the new election cycle. The change in the FEC mandated allocation formula meant that additional federal funds had to be paid for current administrative and other allocable expenses. Had the WSRP used those funds to repay the prior period deficit, the party would have created another excess transfer problem.

The WSRP's 1997 FEC filings show a significant drop in contributions. Simply put, there were not enough federally eligible dollars to repay the excess transfer in full.

Despite the fact that Washington state was likely to be a major battleground in the 1998 House of Representative races, the WSRP devoted a substantial part of its federal receipts during

the cycle to repayment of the prior cycle's error. The WSRP leadership was criticized for using the current receipts to repay the deficit, with critics asserting that cooperation would bring no benefit in reaching a resolution with the FEC.

**D. The breakdown in the accounting system also resulted in other unintentional errors.**

During the same time period, the WSRP erroneously paid nonfederal expenses from its federal account, and reimbursed the account for those expenses. The items were a series of fundraisers. The fundraisers were designed to and did yield only nonfederal dollars. The accounting breakdown also resulted in federally eligible contributions being deposited to nonfederal accounts. In 1996, the WSRP deposited over \$89,000 in apparently federally eligible funds to "state" accounts. The WSRP solicitation disclaimer is the federal disclaimer. See *Exhibit B* for samples. While this error does not "offset" the erroneous reimbursement, it does show that federal funds were available, and that the party made mistakes that did not operate to its advantage. See attached *Exhibit C*.

The Commission should also consider the results of the extensive investigation by the

Washington State Public Disclosure Commission (PDC), in resolving the current matter. The PDC imposed a fine of \$5,000 pursuant to the attached stipulation. Exhibit D..

**E. The 1997 imbalance occurred because of a picnic for party rank and file and the WSRP's use of semiannual reporting.**

The WSRP remained on the semiannual reporting schedule with the FEC during 1997. In 1997, the WSRP sponsored a picnic for rank and file GOP volunteers. The picnic had previously been hosted by one of the county GOP organizations, but the county party was not able to handle the logistics, because the event had grown. The picnic was entirely underwritten by a corporate sponsor.

The picnic was not a budgeted item for the WSRP, as shown in the attached Exhibit E. The picnic became a special line item in the party's financial statements, but not a part of the budget, because the WSRP considered it separate from its operations. The costs of the picnic were about \$151,000. The immediate effect was to trigger the allocation of \$50,000 in federal funds to the picnic. A secondary effect was that the required allocation meant that \$50,000 of federal funds was not available to offset the WSRP's other administrative expenses during the second half of 1997. The net effect of holding a fully-underwritten picnic was to worsen the party's federal fund situation by \$100,000.

The WSRP's semiannual reporting also contributed significantly to the 1997 excess transfer. Initial categorization of expenses during 1997 was done by the party bookkeeper, and reviewed by the comptroller in the course of preparing the second half report for 1997. During the review process, numerous errors in the initial categorization were discovered, with significant consequences to the federal funds imbalance. However, by the time the bookkeeping errors were



discovered, the funds had been transferred.<sup>2</sup>

- F. When the chairman of the WSRP learned of the ability to borrow to cure the deficit, he did so.

In early 1998, the party chairman learned of the 1994 borrowing, and the possibility of paying off the federal account deficit. Immediate steps were undertaken to borrow \$200,000. As the WSRP's FEC reports show, the loan was concluded in February 1998. Along with \$95,000 of additional federal funds, the loan was used to eliminate the 1997 federal account deficit, and make a significant payment toward the remaining 1996 obligation.

During the period February through October 1998, the WSRP paid over \$189,000 of federal funds to eliminate the remaining deficit. The WSRP did so despite the knowledge that the Democrats had targeted several members of the Washington delegation for defeat and despite an anticipated race against a sitting Democrat senator.

- G. The WSRP has taken significant steps to avoid future problems with allocable expense ratios.

As the PDC stipulation indicates, the WSRP accounting system broke down. As the stipulation also indicates, the WSRP agreed in 1998 to undertake substantial remedial action. The WSRP has in place a compliance officer, its executive director has attended an RNC-sponsored seminar on FEC compliance. The WSRP has developed a compliance manual for campaign finance, so there will be an organized, institutional memory. It has instituted other revisions to its operations (including monthly FEC reporting) to prevent future violations.

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<sup>2</sup>As the General Counsel's brief summarizes, transfers to pay allocable expenses must occur within a 70 day window of the expense. For a semiannual reporting committee, almost all transfers must be made based on preliminary determinations of allocation ratios and eligibility. A committee that discovers an error in preparing its report is unable to cure any errors, except for those that occurred in a very small window preceding the filing of the next semiannual report.

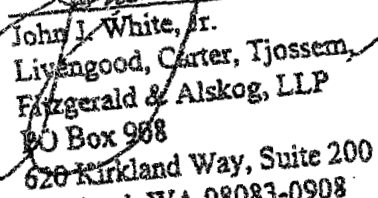
The immediate past WSRP bookkeeper, Michelle Hansen traveled to Washington to receive FEC-sponsored and RNC training in FEC compliance in early summer 1998. The current bookkeeper, Bing Mayton also completed one-on-one training with the Reports Analysis Division in May, 1999 and RNC compliance training while in Washington, D.C.

20.04.396.3379

### III. Conclusion

The Commission should enter into a Conciliation Agreement for the other alleged violations that reflects the substantial cooperation of the WSRP, the nature of the errors, the remedial steps undertaken, and the effectiveness of those steps in avoiding further problems.

Dated this 14<sup>th</sup> day of June, 1999.

  
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Kirkland, WA 98083-0908

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BRIEF OF COMMITTEE - 11

## Washington State Republican Party

Additional Information  
Nine-Year Highlights

	1996	1995	1994	1993	1992	1991	1990	1989	1988
<b>Financial Position Data</b>									
Assets	\$ 101,415	\$ 171,301	\$ 180,582	\$ 41,111	\$ 77,022	\$ 76,078	\$ 67,972	\$ 65,702	\$ 114,292
Liabilities	\$ 232,220	\$ 107,193	\$ 137,197	\$ 95,883	\$ 43,412	\$ 56,206	\$ 100,948	\$ 47,987	\$ 104,906
Net assets	\$ (128,805)	\$ 64,606	\$ 43,385	\$ (54,766)	\$ 33,607	\$ 19,872	\$ (32,969)	\$ 17,722	\$ 9,287

## Statement of Activities Data

<b>Revenues</b>									
Contributions	\$7,148,394	\$1,662,117	\$7,565,785	\$1,065,970	\$1,674,931	\$ 815,509	\$1,249,256	\$ 942,913	\$1,855,262
Amplification	81,357	58,214	62,382	77,687	78,766	88,536	84,134	71,882	60,790
Other	221,310	62,103	60,910	57,514	50,542	63,846	78,679	85,039	28,863
Total revenues	7,449,061	1,782,436	2,689,077	1,201,171	1,804,239	967,891	1,411,869	1,101,834	1,944,915
<b>Expenses</b>									
Program services	6,209,928	590,304	1,240,179	395,331	1,026,050	257,774	726,403	433,340	1,254,254
Support services	1,428,444	1,170,711	1,330,947	894,213	764,454	657,276	736,157	660,159	618,470
Total expenses	7,637,472	1,761,015	2,591,126	1,289,544	1,790,504	915,050	1,462,560	1,093,499	1,872,724
Increase (decrease) in net assets	\$ (188,411)	\$ 21,421	\$ 97,951	\$ (88,373)	\$ 13,735	\$ 52,841	\$ (50,691)	\$ 8,335	\$ 72,191

EXHIBIT A

Dec 29 '99

15:12

0014

☒ **I'LL DO MY PART TO LEAD OUR REPUBLICANS TO VICTORY!**

Enclosed is my contribution to the Washington State Republican Party for:

☐ \$25 ☐ \$50 ☐ \$100 ☐ \$250 ☐ \$500 ☐ other \$\_\_\_\_\_

SEE OTHER SIDE FOR IMPORTANT INFORMATION!

☐ I would like to contribute with Visa/Mastercard (see reverse)

PLEASE RETURN THIS FORM  
WITH YOUR CHECK IN THE  
ENCLOSED POSTAGE-PAID  
ENVELOPE - THANK YOU!

☒ **I'LL DO MY PART TO LEAD OUR REPUBLICANS TO VICTORY!**

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WITH YOUR CHECK IN THE  
ENCLOSED POSTAGE-PAID  
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☐ \$25 ☐ \$50 ☐ \$100 ☐ \$250 ☐ \$500 ☐ other \$\_\_\_\_\_

SEE OTHER SIDE FOR IMPORTANT INFORMATION!

☐ I would like to contribute with Visa/Mastercard (see reverse)

PLEASE RETURN THIS FORM  
WITH YOUR CHECK IN THE  
ENCLOSED POSTAGE-PAID  
ENVELOPE - THANK YOU!

**EXHIBIT B**

20.04.396.3381

Card/Account No. \_\_\_\_\_ Exp. \_\_\_\_\_

Signature \_\_\_\_\_ Amount \$ \_\_\_\_\_

Federal law requires us to obtain the following information from donors whose contributions exceed \$200 per calendar year:

Occupation: \_\_\_\_\_

Employer/Business name: \_\_\_\_\_

Are you self-employed? \_\_\_\_\_

Paid for by the Washington State Republican Party federal account. Funds received in response to this solicitation will be deposited into the federal account unless otherwise prohibited. Political contributions are not tax deductible for any purpose.

Please bill my: ☐ VISA ☐ MasterCard

Card/Account No. \_\_\_\_\_ Exp. \_\_\_\_\_

Signature \_\_\_\_\_ Amount \$ \_\_\_\_\_

Federal law requires us to obtain the following information from donors whose contributions exceed \$200 per calendar year:

Occupation: \_\_\_\_\_

Employer/Business name: \_\_\_\_\_

Are you self-employed? \_\_\_\_\_

Paid for by the Washington State Republican Party federal account. Funds received in response to this solicitation will be deposited into the federal account unless otherwise prohibited. Political contributions are not tax deductible for any purpose.

Please bill my: ☐ VISA ☐ MasterCard

Card/Account No. \_\_\_\_\_ Exp. \_\_\_\_\_

Signature \_\_\_\_\_ Amount \$ \_\_\_\_\_

Federal law requires us to obtain the following information from donors whose contributions exceed \$200 per calendar year:

Occupation: \_\_\_\_\_

Employer/Business name: \_\_\_\_\_

Are you self-employed? \_\_\_\_\_

Paid for by the Washington State Republican Party federal account. Funds received in response to this solicitation will be deposited into the federal account unless otherwise prohibited. Political contributions are not tax deductible for any purpose.

**THANK YOU  
FOR YOUR  
PLEDGE OF  
SUPPORT!**

**THANK YOU  
FOR YOUR  
PLEDGE OF  
SUPPORT!**

**THANK YOU  
FOR YOUR  
PLEDGE OF  
SUPPORT!**

Dec 29 1999

16:09

P.04

DEC-29-99 MON 03:17

FAX NO.

P. 02

*A personal message from*  
**KEN EIKENBERRY**

December 6, 1996

Dear Mr. ...

I write today with a grateful heart for your dedication and support of the Washington State Republican Party.

It's been a long, tough campaign...but in the end, we proved that 1994 was no aberration. We proved that the people of Washington are still ready for conservative change.

And we proved that the Republican message of lower taxes, less government and more freedom is not just a campaign slogan...it's a message that hits home with the majority of Washington voters, and a commitment that we intend to keep in the next two years.

Because of your commitment and support, we have finally taken control of both the State House and the State Senate. For the first time since 1982, Republicans will be able to create responsible, family-friendly legislation...and pass a legacy of common-sense policy on in our children.

Speaker Clyde Bullard will remain Speaker of the House...and Senator Minority Leader Dan McDonald will now become Senate Majority Leader. Together they will forge a responsible, proactive legislative agenda that will carry us through the next two years and beyond.

Together we fought off an all-out direct attack on our Republican Members of Congress. I know that you share my disgust at the vicious, unfair attacks targeted at our courageous freshmen...

...and I am pleased to report that despite millions of dollars in union and special interest money, we are returning Jennifer Dunn, Rick White, Don Hastings, Linda Smith, Jack Marshall and George Nethercutt to Washington, DC to continue the work of a Republican-controlled U.S. House and Senate.

(over, please)

LIBERATE GOP VICTORY

Here is my contribution to help retire the debt and celebrate Republican victory! Enclosed find my check to the WSRP for:

☐ \$15 ☐ \$25 ☐ \$50 ☐ \$100 ☐ other \$ \_\_\_\_\_

See other side for important information!

☐ Visa/Mastercard (see reverse)

PLEASE RETURN THIS FORM  
 WITH YOUR CHECK IN THE  
 ENCLOSED POSTAGE-PAID  
 BOX





**I'm putting it in writing!**

Reply Received From:

NN

NAME NO  
SEATTLE WA 98101-3000

**I'm acting today to help ensure that our  
Party has the resources to veto Bill Clinton  
and Mike Lowry for good in '96.**

Enclosed is my contribution of:

☐ \$25 ☐ \$50 ☐ \$100 ☐ Other \$ \_\_\_\_\_

My check is made payable to the  
Washington State Republican Party.

Contributions are not deductible for federal income tax purposes.  
Federal law requires political committees to report the name, mailing address, occupation and name  
of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

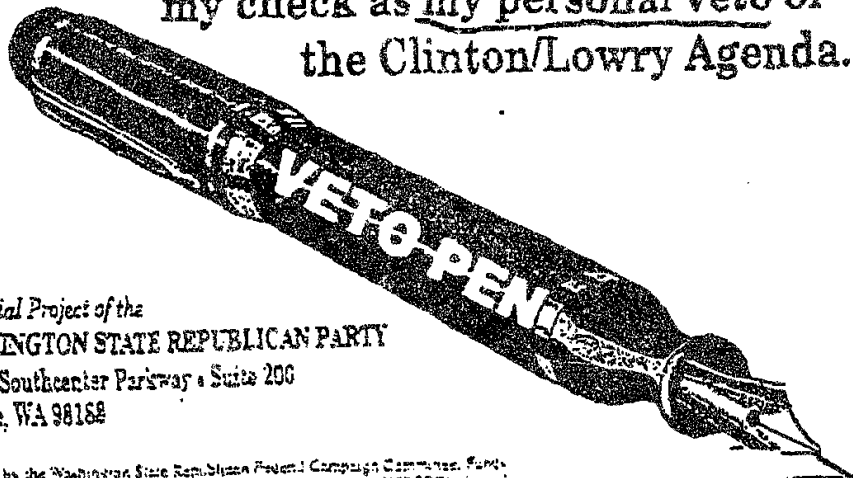
Occupation: \_\_\_\_\_

Employer/Business Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

Are you self-employed? ☐ Yes ☐ No

**Please consider my signature on  
my check as my personal veto of  
the Clinton/Lowry Agenda.**



A Special Project of the  
**WASHINGTON STATE REPUBLICAN PARTY**  
16400 Southcenter Parkway, Suite 200  
Seattle, WA 98168

Paid for by the Washington State Republican Federal Campaign Committee. Funds  
received in response to this solicitation will be deposited in the WSRPC's federal  
account unless otherwise prohibited.

**LET'S VETO CLINTON & LOWRY IN '96**

1995  
5/11/96

5833 963 40 02

Dec 29 '99 16:15

P. 14

019

## STATE ISSUE

- 1995  
Sample
7. On the issue of transportation, where do you think the state should focus spending?  
☐ Mass transit ☐ New road construction ☐ Maintenance  
☐ Other \_\_\_\_\_
8. Where do you believe reductions in state spending would be the most effective?  
☐ Reduction of government employees  
☐ Elimination of ineffective social programs  
☐ Freezing state spending  
☐ Privatizing some government services  
☐ Other \_\_\_\_\_
9. Do you support or oppose Affirmative Action as a policy for hiring in state government?  
☐ Support ☐ Oppose ☐ No opinion
10. Do you support or oppose the promotion of traditional moral values by state government in schools?  
☐ Support ☐ Oppose ☐ No opinion
11. Please rank the following state government issues in order of importance to you. Place a "1" by the most important and so on.  
☐ Education ☐ Crime prevention ☐ Moral values  
☐ Cutting taxes ☐ Reducing government spending  
☐ Transportation ☐ Other \_\_\_\_\_
12. How do you rate the performance of the new Republican majority in the State House of Representatives?  
☐ Excellent ☐ Good ☐ Fair ☐ Poor ☐ Undecided

### Demographics Information

(optional)

13. Number of years as a Sustaining Member of the Republican Party:  
☐ 2 or less ☐ 3 - 5 ☐ 6 - 10 ☐ More than 10
14. Your age:  
☐ 75 or older ☐ 74 - 65 ☐ 64 - 55 ☐ 54 - 45  
☐ 44 or under
15. Number of candidates you support financially in election years:  
☐ None ☐ 1 - 2 ☐ 3 - 5 ☐ More than 5
16. What type of candidates do you usually support?  
 Check all that are appropriate.  
☐ Focus on moral issues, like school prayer  
☐ Focus on social issues, like welfare  
☐ Focus on fiscal issues, like taxes and spending  
☐ Focus on criminal justice issues  
☐ Focus on education issues  
☐ Focus on reform issues  
☐ Other \_\_\_\_\_

EXHIBIT F  
 PAGE 2 OF 4 PAGES

Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

Occupation: \_\_\_\_\_

Employer/Business Name: \_\_\_\_\_

Are you self-employed? ☐ Yes ☐ No

Dec 29 '98

16:14

P. 13

020

## MEMBER SURVEY

**Washington**  
**State**  
**Republican**  
**Party**

Dear Friend:

With our new Republican majorities in Washington, D.C., and Olympia restoring the public's faith in government, imagine how much greater things can be with a Republican in the White House and the Governor's office.

It can happen ... with your help today.

Here, it seems early, but our Party must plan and prepare now for the extraordinary challenges of a Presidential election year. The attached survey is the first step of that process.

Only a select number of informed citizens in your area are receiving the survey, so I urge you to respond as soon as possible.

At the same time, when you return your survey please include a contribution to help us prepare for this important Presidential election year. Your contribution for \$15, \$20, \$25, \$50, \$100, or whatever you can afford, will go a long way to help defeat Bill Clinton and Mike Lowmy and elect more Republicans.

Make your voice heard today!

Return this survey to:  
State Rep  
April 29, 1999

Sincerely,  
*Ken Eikenberry*  
Ken Eikenberry  
Chairman

Detach Here ▼

Contribution not deductible for federal income tax purposes.

Detach Here ▼

**Yes!** I'll assist the Party with a contribution of:  
☐ \$15 ☐ \$20 ☐ \$25 ☐ \$50 ☐ \$100 ☐ Other \$ \_\_\_\_\_

1. Please indicate your choice for President in 1996.

☐ Clinton/Alexander ☐ Bob Dornan ☐ Richard Lugar

☐ Pat Buchanan ☐ Phil Griffin ☐ Allen Spicer

☐ Clint Lede ☐ Alan Keyes ☐ Pete Wilson

☐ Other \_\_\_\_\_

2. Please rank the following issues on their importance to you. Place a "1" for most important and so on.

☐ Overseeing Taxes

☐ Defense

☐ Welfare Reform

☐ Deficit Reduction

☐ Budget/Spending

☐ Health Care Reform

☐ Foreign Policy

☐ Education

3. How do you rate the performance of the new Republican leadership in Congress?  
☐ Excellent ☐ Good ☐ Fair ☐ Poor ☐ Undecided

4. Which of the following proposals do you feel would best give a tax break to middle-class Americans?  
☐ Cut the current income tax rate

☐ Offer a \$500 per child tax credit

☐ Institute a "flat tax" which would require all Americans to pay the same percent of tax.

Name \_\_\_\_\_

Address \_\_\_\_\_

City/State/Zip \_\_\_\_\_

Occupation \_\_\_\_\_

Employer \_\_\_\_\_

INSTRUCTIONS: Detach ball and enclose with check in this postage paid envelope. Mail today!

Federal law requires political committees to record the name, mailing address, occupation and name of employer of each individual whose contributions aggregate in excess of \$200 in a calendar year.

Fund for by the Washington State Republican Federal Campaign Committee and the Washington State Republican Party. Funds received in response to this solicitation will be deposited in the WSRRFC's federal account unless otherwise prohibited.

4022 500 40 442

Please bill my: ☐ VISA ☒ MasterCard

Card/Acct. No. \_\_\_\_\_

Exp. Date \_\_\_\_\_

Signature \_\_\_\_\_

Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$100 in a calendar year.

Occupation: \_\_\_\_\_

Employer/Business Name: \_\_\_\_\_

Employer Address: \_\_\_\_\_

Are you self-employed? ☐ Yes ☒ No

Telephone: ( ) \_\_\_\_\_

Post for the Washington State Republican Party Campaign Committee. Funds received in response to this card will be reported to the WSRPCC's Federal Election Commission report.

# 1995 Membership Pledge Form

16400 Southcenter Parkway, Suite 200 • Seattle, WA 98133

I agree! Washington Republicans are fighting for my interests every day. That's why I'm proud to support the Party as a 1995 Sustaining Member and enclose my check, payable to the Washington State Republican Party in the following amount:

☐ \$25 ☐ \$50 ☐ \$100 ☐ Other \$ \_\_\_\_\_

SEATTLE, WA 98133

2295 015



◀ Detach and return form ▲ Remove and keep card

Please see reverse side for additional information.

Political contributions are not deductible as charitable contributions for federal income tax purposes.

Washington State Republican Party  
Summary of Individual Deposits to State Exempt Account  
From partial review of C-3 forms in WSRP archives  
Year ended December 31, 1996

## Individuals

1/5/96 George Swindells	\$ 250.00	
1/5/96 Susan Hawes-Swindells	250.00	
1/12/96 William Conner	2,500.00	
2/1/96 Mr. (sic) Gail Foreman	250.00	
2/27/96 E.M. Riley	5,000.00	
2/28/96 Dr. Randi Leggett, MD	150.00	
2/28/96 Dr. Jim Leggett	150.00	
5/10/96 Mr. & Mrs. Langdon Simons	1,200.00	
6/4/96 Mr. Kenton Thurmun	250.00	
6/12/96 Darlene Brozovich	250.00	
6/12/96 Al Symington	1,000.00	
6/13/96 Sandra Boyd	250.00	
6/13/96 James G. McCurdy	1,000.00	
6/13/96 Daryl Hill	1,200.00	
8/26/96 Mr. Donald R. Fordyce	2,500.00	
9/4/96 Jack McCann	1,000.00	
9/6/96 Mr. & Mrs. George Weyerhaeuser	7,500.00	(Could have sought appropriate attribution.)
9/12/96 Mr. & Mrs. Everett Paup	2,000.00	
9/20/96 Mr. Doug Roger	2,000.00	
10/7/96 Mr. & Mrs. Frank Ives	5,000.00	
10/8/96 Carney Badley Smith & Spellman	200.00	
10/14/96 Mr. Donald R. Fordyce	2,500.00	
	<u>\$ 36,400.00</u>	

EXHIBIT C

**Partnerships, LLPs, LLCs, Associations**

1/12/96 Washbankpac	\$ 250.00	
2/27/96 Clay Enterprises	1,200.00	
6/10/96 Columbia Paint & Coatings	250.00	
6/10/96 Kodiak Salmon Packers	250.00	
8/27/96 Plum Creek Timber	5,000.00	Check was for \$59,250, could have
9/11/96 Port Blakely Tree Farms	5,000.00	gotten separate check for federal.
10/8/96 Carney Badley Smith & Spellman	200.00	
10/11/96 Football Northwest Partnership	5,000.00	Check was for \$7,250, could have
10/12/96 Bldg. Industry Assn.	1,000.00	gotten separate check for federal.
10/12/96 The Overton Company	5,000.00	
10/14/96 SDS Lumber Company	5,000.00	
10/14/96 Energy Associates	4,800.00	
10/17/96 Washington Chiropractic Trust	5,000.00	
11/1/96 Law and Regulation	2,250.00	
12/23/96 First Associates	2,000.00	
10/21/96 Cellular Telecom Industry	5,000.00	
	<u>\$ 47,200.00</u>	

**PACs and Other**

2/27/96 GTE Political Action Club	\$ 1,000.00
9/5/96 Sabey PAC	1,000.00
10/8/96 HIAPAC	400.00
10/8/96 WEPAC	400.00
10/8/96 ABC of Western WA PAC	1,000.00
10/18/96 The Committee for Natural Gas	2,250.00
	<u>\$ 6,050.00</u>

Total Apparently Federally Eligible Items	<u>\$ 53,250.00</u>
---	---------------------

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
STATE OF WASHINGTON

NO. 97-269

IN THE MATTER OF ENFORCEMENT  
ACTION AGAINST

STIPULATION OF  
VIOLATIONS AND PENALTIES

WASHINGTON STATE  
REPUBLICAN PARTY,

Respondent.

Public Disclosure Commission Enforcement Staff (Staff) and the Respondent, Washington State Republican Party (Party) have already stipulated to facts as they prepare for the hearings set for June 23 and 24, 1998. Those stipulated facts are incorporated by reference into this Stipulation and provide the factual bases for the stipulated violations and proposed penalties below. Based upon the factual record, and in response to the Commission's directives to narrow the issues to be presented at the June 23, 24, 1998 hearing, the Staff and the Party recommend that the Commission adopt the violation stipulation and accept the proposed penalties for those violations.

STIPULATED VIOLATIONS:

Staff and Party stipulate to the following violations of chapter 42.17 RCW should the Commission choose to adopt them by way of a Final Order. By stipulating to the violations, neither Staff nor the Party intend to prevent the Commission from rejecting all or any part of the stipulated violations or proposed penalties. By stipulating to the violations, neither Staff nor the

**EXHIBIT D**

1 Party intend to prevent the Commission from referring all or any part of the charged violations to  
2 the Attorney General's Office for civil remedies and potentially-higher penalties under chapter  
3 42.17 RCW. Any stipulated violation rejected by the Commission and referred to the Attorney  
4 General's Office shall no longer be subject to the stipulations or proposed penalties listed below.  
5 All stipulated violations and proposed penalties are, for the purposes of the violation stipulation,  
6 non intentional but are the result of Party staff's misunderstandings of public disclosure laws,  
7 failure of the Party's pre-existing internal accounting systems to adequately track the volume of  
8 1996 activity, or miscommunication between Party staff and vendors.

- 9 1. The Party's payment of \$24,000 to Dave Mortenson and Associates on October 30,  
10 1996 from its exempt contributions account (See, Stipulation of Facts, page 6, lines 4-  
11 18) violated RCW 42.17.640.
- 12 2. The Party's payment of \$2500 to Polis Political Services, Inc. on January 10, 1996 for  
13 consulting services and \$500 for a survey in the 18<sup>th</sup> Legislative District from its  
14 exempt contributions account (See, Stipulation of Facts, page 11-14) violated RCW  
15 42.17.640.
- 16 3. The Party's payment of \$1800 to Polis Political Services, Inc. for a survey of the 22<sup>nd</sup>  
17 Legislative District from its exempt contributions account (See, Stipulation of Facts,  
18 pages 13-14, lines 25-18) violated RCW 42.17.640.
- 19 4. The Party's acceptance of \$12,500 from The Speakers Roundtable; \$10,000 from the  
20 Senate Leadership Fund; and \$10,000 from the Leadership Council (See, Stipulation  
21 of Facts, pages 19-20, lines 24-11) exceeded contribution limits and violated RCW  
22 42.17.640.
- 23 5. The Party's payment of \$84,000 from its exempt contributions account to The  
24 Speakers Roundtable for its direct-mail program, while based on Kim Martin's  
25 representations and in reliance on Staff Quick Reference Sheets (See, Stipulation of  
26 Facts, pages 22-23, lines 7-4) violated RCW 42.17.640.



- 1 6. The Party's payment of \$2,000 on May 23, 1997 from its exempt contributions  
2 account to the Capitol Fund (See, Stipulation of Facts, page 23, lines 6-9).violated  
3 RCW 42.17.640.
- 4 7. The Party's payment to Don Benton (See, Stipulation of Facts, page 17, line 22)  
5 exceeded the 17<sup>th</sup> Legislative District contribution limit by \$7,065.35 and violated  
6 RCW 42.17.640.
- 7 8. The Party's payment to Steve Hargrove (See, Stipulation of Facts, page 17, line 23)  
8 exceeded the 23<sup>rd</sup> Legislative District contribution limit by \$3,677.43 and violated  
9 RCW 42.17.640.
- 10 9. The Party's in-kind contribution to Grant Pelesky (See, Stipulation of Facts, page 17,  
11 line 24) exceeded the 25<sup>th</sup> Legislative District contribution limit by \$10,626.34 and  
12 violated RCW 42.17.640.
- 13 10. The Party's amended post-election C-4 report untimely reported orders placed (See,  
14 Stipulation of Facts, page 23, lines 12-18) violating RCW 42.17.080 and RCW  
15 42.17.090.
- 16 11. The Party's non-reporting to 10 candidates of expenditures made on their behalf  
17 during the 21-days preceding the 1996 general election (See, Stipulation of Facts,  
18 pages 23-24, lines 22-15) violated RCW 42.17.105.
- 19 12. The Party's reporting of transfers to its federal account should have included greater  
20 detail (See, Stipulation of Facts, page 17, lines 9-17) and violated RCW 42.17.080  
21 and RCW 42.17.090.

22 PROPOSED PENALTIES:

- 23 1. The Party will pay a \$5000 penalty to the Commission within 5 working days of the  
24 Commission's Order accepting this proposed penalty.
- 25 2. The Party will pay \$1,000 in Staff attorney's fees within 5 working days of the  
26 Commission's Order accepting this proposed penalty.

- 1 3. The Party will reimburse \$147,300 from its non-exempt contributions account into its  
2 exempt contributions account. The Party will reimburse the funds according to the  
3 following payment structure. The Party will reimburse \$94,000 within 5 working  
4 days of the Commission's Order accepting this proposed penalty. The Party will  
5 provide staff with written documentation of the account transfer. At the end of each  
6 following month, until March 31, 1999, the Party will reimburse 5% of the prior  
7 month's total deposits into its non-exempt contributions account (or \$2500 whichever  
8 is greater) into its exempt contributions account and provide written documentation to  
9 Staff. Any amount remaining to be reimbursed from the non-exempt contributions  
10 account to the exempt contributions account, under the terms of this proposed  
11 penalty, on March 31, 1999 shall be transferred in full by April 1, 1999. Staff agrees  
12 to provide Staff interpretation to the Party, within thirty working days of the of the  
13 Commission's Order accepting this penalty proposal, regarding the applicability of  
14 the session-freeze to this time-period and whether legislators may assist in Party  
15 fundraising during this period.
- 16 4. The Party will provide a half-day training course before the 1998 elections to County  
17 and Legislative District Party staff. The training course will include presentations by  
18 Staff and will focus on complying with chapter 42.17 RCW. Further details of the  
19 training course will be agreed upon by the Party and the Staff.
- 20 5. The Party and Staff will consult to reach a coordinated and agreed upon format for  
21 reporting transfers to its federal account.
- 22 6. The Party agrees to design and complete an internal compliance manual to assist  
23 Party staff in complying with campaign-finance laws..
- 24 7. The Party agrees to computerize its internal accounting controls to ensure timely and  
25 accurate reporting and monitoring of contributions accepted and expenditures made.  
26

1 8. The Party agrees to establish internal protocol to improve communication between  
2 political and accounting staff relating to compliance with chapter 42.17 RCW.

3 9. The Party agrees to immediately begin an interview process aimed at retaining a part-  
4 time campaign-finance law compliance specialist.

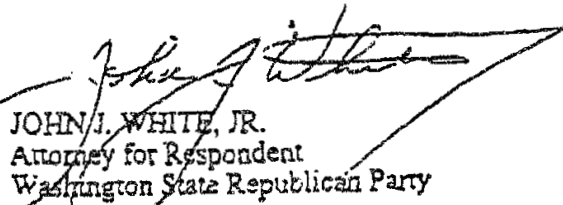
5 Agreed and Jointly-Presented to the Commission this 12<sup>th</sup> day of June,

6 CHRISTINE O. GREGOIRE  
7 Attorney General

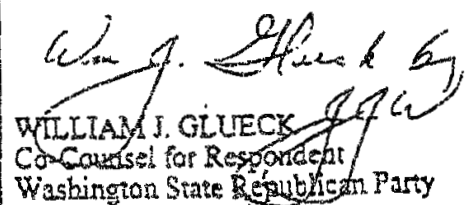
8 

9 STEPHEN T. REINMUTH  
10 Assistant Attorney General  
11 Attorneys for Public Disclosure Commission  
12 Enforcement Staff

13 LIVENGOOD, CARTER, TOSSEM,  
14 FITZGERALD & ALSKOG, LLP

15   
16 JOHN J. WHITE, JR.  
17 Attorney for Respondent  
18 Washington State Republican Party

19 APPEL & GLUECK, P.C.

20   
21 WILLIAM J. GLUECK  
22 Co-Counsel for Respondent  
23 Washington State Republican Party  
24  
25  
26

WASHINGTON STATE REPUBLICAN PARTY  
STATEMENT OF REVENUES, EXPENSES AND BUDGET COMPARISONS  
For the Twelve Months Ending December 31, 1997

Prepared: November 19, 1998

	Current Month Actual	Current Month Budget	Month Variance	Year to Date Actual	Year to Date Budget	Y-T-D Variance
POLITICAL DIVISION EXPENSES						
PICNIC	0.00					
Picnic Expense		0.00	0.00	154,110.68	151,000.00	3,110.68
CAMPAIGN SERVICES						
Survey Research						
Opportunity Research						
Candidate Recruitment						
Polling and Tracking						
Voter Modeling/Targeting						
Local Election						
CANDIDATE FUND EXPENDITURES						
Legislative Campaign Fund						
Federal Candidate Fund						
Candidate Fund - Fundraising						
VOTER PROGRAMS FUND EXPENDITURES						
List Development/Mail						
Voter Identification						
Absentee Ballot Program						
Out-Of-The-Vote Program						
YOUTH DEVELOPMENT						
Republican Youth Groups						
College Intern Program						

EXHIBIT F

CONFIDENTIAL - FOR INTERNAL USE ONLY.

Washington State Republican Party  
Summary of Individual Deposits to State Exempt Account  
From partial review of C-3 forms in WSRP archives  
Year ended December 31, 1996

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2/28/98 Dr. Jim Leggett	150.00	
5/10/98 Mr. & Mrs. Langdon Simons	1,200.00	
6/4/98 Mr. Kenton Thurmun	250.00	
6/12/98 Darlene Brozovich	250.00	
6/12/98 Al Symington	1,000.00	
6/13/98 Sandra Boyd	250.00	
6/13/98 James G. McCurdy	1,000.00	
6/13/98 Daryl Hill	1,200.00	
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9/20/98 Mr. Doug Roger	2,000.00	
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	<u>\$ 47,200.00</u>	

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10/18/96 The Committee for Natural Gas	2,250.00
	<u>\$ 6,050.00</u>

Total Apparently Federally Eligible Items	<u>\$ 53,250.00</u>
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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

March 20, 1997

Al Symington, Treasurer  
Washington State Republican Party-  
Federal Account  
16400 Southcenter Parkway, Suite 200  
Seattle, WA 98188

Identification Number: C00031088

Reference: 30 Day Post-General Report (10/16/96-11/25/96)

Dear Mr. Symington:

On February 26, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 5, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.


-Your calculations for Line 31, Columns A and B appear to be incorrect. FEC calculations disclose this amount(s) to be \$400, 936.94 and \$1,863, 768.68 respectively. Please provide the corrected total(s) on the Detailed Summary Page.

-Schedule H2 indicates the allocation ratio for Telemarketing P-609 and Direct Mail V-96-GOR were revised during the reporting period. Please provide the date on which this revision became effective. In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.


-On Schedule H2, you disclose the ratio for Telemarketing P-610 to be the same as previously reported; however, it appears that this activity/event was not previously reported. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)


EXHIBIT F

WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT  
PAGE 2

 -Schedule H3 discloses receipt of \$91,473.41 from your non-federal account for fundraising events which are listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, 100% non-federal fundraising events do not fall within the definitions of allocable expenses, and constitute an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

 Please clarify all expenditures made for GOTV (such as TV and radio ads, phone banks & printing), the Kasich event and polling & surveys on Schedules B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

 -Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

 On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amount for a



WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT  
PAGE 3

payment(s) to several vendors. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-Schedule H4 of your report discloses a payment to Targeted Creative Communications as an in-kind transfer from the Republican National Committee. There is no indication of receipt of the federal portion (totaling \$764.00) listed on Schedule A of your report. Please amend your report to disclose this payment.

-Schedule H3 of your report (pertinent portion attached) discloses a transfer-in from the Republican National Committee to pay for Administrative/Voter Drive expenses of your committee. Please note that 11 CFR 106.5 (g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). As the Republican National Committee is not a non-federal account of your committee, such a transfer is prohibited.

If the transfer in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a prohibited transfer, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the Republican National Committee.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

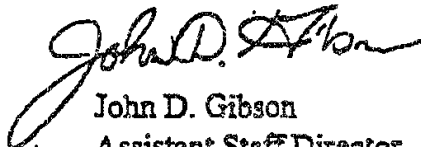
Although the Commission may take further legal action concerning the acceptance of prohibited transfers, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT  
PAGE 4

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Andrea Wilkens on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

2016-04-29 16:40:02

**RECEIPT SCHEDULE H3**  
 (effective 1/1/91)

**TRANSFERS FROM  
NON-FEDERAL ACCOUNTS**

 PAGE 8 OF 8  
 FOR LINE 18

NAME OF COMMITTEE

Washington State Republican Party-Federal

TOTAL AMOUNT  
TRANSFERRED

NAME OF ACCOUNT

Washington State Republican Party - Federal

DATE OF RECEIPT

11-14-96

\$75,000.00

## BREAKDOWN OF TRANSFER RECEIVED

	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND- RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
1) Total Administrative/Voter Drive	75000.00		
2) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
3) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

NAME OF ACCOUNT

Republican National Committee

DATE OF RECEIPT

10-23-96

\$2710.50

## BREAKDOWN OF TRANSFER RECEIVED

	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND- RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
1) Total Administrative/Voter Drive	2710.50		
2) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
3) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

## TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

SUBTOTAL THIS PAGE

	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND- RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
	77710.50		
	1331760.50		

77710.50

1331760.50